

**FILED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JUN 18 2008

UNITED STATES OF AMERICA ) MAGISTRATE JUDGE ARLANDER KEYS  
v. ) UNITED STATES DISTRICT COURT  
UGUR YILDIZ ) No. 08 CR 480  
 ) U.S. Magistrate Arlander Keys  
 ) **UNDER SEAL**

**GOVERNMENT'S MOTION TO SEAL COMPLAINT, AFFIDAVIT IN SUPPORT OF  
COMPLAINT, AND ARREST WARRANT**

Now comes the UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal the Complaint, the Affidavit in Support of the Complaint, and the Arrest Warrant:

Special Agent Luke Lambert of the United States Immigration and Customs Enforcement Agency is the primary source of information for the Complaint, the Affidavit in Support of the Complaint, and the Arrest Warrant. The Affidavit details the facts supporting probable cause that, between April 15, 2006 and June 15, 2006, inclusive, Ugur Yildiz ("Yildiz"), exported firearms in violation of the Arms Export Control Act, in violation of Title 22, United States Code, Section 2778(b)(2). If Yildiz were made aware of the existence of the Complaint and the Arrest Warrant, Yildiz likely would flee this jurisdiction. In addition, if Yildiz were made aware of the facts in the Affidavit in Support of the Complaint, there is the danger that Yildiz could threaten or harm witnesses, or destroy evidence.

For the foregoing reasons, the government respectfully requests that the Complaint, the Affidavit in Support of the Complaint, and the Arrest Warrant be sealed until the arrest of Yildiz.

Respectfully submitted,

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DATE: June 18, 2008